

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

In re:	:	Chapter 11
	:	
CIRCUIT CITY STORES, INC., et al.,	:	Case No: 08-35653-KRH
	:	
Debtors	:	(Jointly Administered)
	:	
	:	

MOTION TO ADMIT PRO HAC VICE

Neil E. McCullagh, Esquire moves this Court for an Order permitting Mary L. Fullington, Esquire (“Ms. Fullington”) to appear and represent Scripps Networks Interactive, Inc., dba Home & Garden Television or HGTV, *pro hac vice* in the above-styled bankruptcy cases and any related adversary litigation, and in support of his Motion, states as follows:

1. I am a member in good standing of the Bar of the Commonwealth of Virginia and the United States Bankruptcy Court for the Eastern District of Virginia. I will be associated with Ms. Fullington in this matter. My business address and bar number are as follows:

Neil E. McCullagh (VSB #39027)
Spotts Fain PC
411 E. Franklin Street, Suite 600
Richmond, VA 23219

2. Ms. Fullington is a member in good standing of the Bar of the State of Kentucky, the state of her residence, and is admitted to practice in the State of Louisiana and before the United States District Courts for the Middle District of Louisiana, the Western District of

Mary L. Fullington, Esquire (Bar #85335)
Wyatt, Tarrant & Combs, LLP
250 West Main Street, Suite 1600
Lexington, Kentucky 40507-1746
Phone: (859) 233-2012
Facsimile: (859) 259-0649

Neil E. McCullagh, Esquire (VSB #39027)
Jennifer J. West, Esquire (VSB #47522)
Spotts Fain PC
411 E. Franklin Street, Suite 600
Richmond, Virginia 23219
Phone: (804) 697-2000
Facsimile: (804) 697-2100

*Co-Counsel for Scripps Networks Interactive, Inc.,
dba Home & Garden Television or HGTV*

Louisiana, the Eastern District of Kentucky, the Western District of Kentucky, the Northern District of Illinois and the Southern District of Indiana. Ms. Fullington is almost admitted to practice before the United States Court of Appeals for the Fifth Circuit. Her business address is as follows:

Wyatt, Tarrant & Combs, LLP
250 West Main Street, Suite 1600
Lexington, Kentucky 40507-1746

3. Ms. Fullington has not been the subject of disciplinary action by the Bar or courts of the State of Kentucky, or any state or any Federal Court.

4. Ms. Fullington has not been denied admission to the courts of any state or to any Federal Court.

5. Ms. Fullington has completed an Application to Qualify As A Foreign Attorney Under Local Bankruptcy Rule 2090-1(E)(2), a copy of which is attached as **Exhibit A.**

WHEREFORE, Neil E. McCullagh, Esquire prays that this Court grant his Motion to permit Mary L. Fullington, Esquire to represent Scripps Networks Interactive, Inc., dba Home & Garden Television or HGTV *pro hac vice* in this case and for such other and further relief as this Court deems just and proper.

Respectfully submitted this 3rd day of January, 2012,

/s/ Neil E. McCullagh

Neil E. McCullagh, Esquire (VSB #39027)
Jennifer J. West, Esquire (VSB #47522)
Spotts Fain PC
411 East Franklin Street, Suite 600
Richmond, Virginia 23219
Phone: (804) 697-2000
Facsimile: (804) 697-2100
*Co-Counsel for Scripps Networks Interactive, Inc.,
dba Home & Garden Television or HGTV*

CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of January, 2012, a copy of the foregoing Motion was served by U.S. Mail, First Class, postage prepaid and/or electronic means through the Court's ECF system on the following, constituting all necessary parties:

Andrew W. Caine, Esquire
Jeffrey Nolan, Esquire
Pachulski Stang Ziehl & Jones LLP
10100 Santa Monica Boulevard
Los Angeles, CA 90067-4100

Lynn L. Tavenner, Esquire
Paula S. Beran, Esquire
Tavenner & Beran, PLC
20 North Eighth Street, 2nd Floor
Richmond, VA 23219

Office of the U.S. Trustee
Attn: Robert Van Arsdale, Esquire
701 East Broad Street
Suite 4304
Richmond, VA 23219

/s/ Neil E. McCullagh